

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL GONIDAKIS, MARY PARKER,
MARGARET CONDITT, BETH
VANDERKOOI, LINDA SMITH,
DELBERT DUDUIT, THOMAS W. KIDD
JR., DUCIA HAMM,

Plaintiffs,

BRIA BENNETT, REGINA C. ADAMS,
KATHLEEN M. BRINKMAN, MARTHA
CLARK, SUSANNE L. DYKE, MERYL
NEIMAN, HOLLY OYSTER, CONSTANCE
RUBIN, EVERETT TOTTY,

Intervenor-Plaintiffs,

v.

FRANK LAROSE, in his capacity as Ohio
Secretary of State,

Defendant.

Case No. 2:22-cv-00773

Judge Amul R. Thapar
Judge Algenon L. Marbley
Judge Benjamin J. Beaton

BENNETT PETITIONERS' INITIAL DISCLOSURE OF WITNESSES

In accordance with the Court's Order, ECF No. 115, Intervenor-Plaintiffs Bria Bennett, Regina C. Adams, Kathleen M. Brinkman, Martha Clark, Susanne L. Dyke, Meryl Neiman, Holly Oyster, Constance Rubin, and Everett Totty (the "Bennett Petitioners") hereby reserve the right to call the following persons as witnesses at the preliminary injunction hearing:

1. Dr. Jonathan Rodden (Remote Witness)

Professor of Political Science, Stanford University
Encina Hall Central
616 Serra Street
Stanford, CA 94305

Dr. Rodden may testify about Ohio General Assembly district plans that the Ohio Redistricting Commission has considered and/or adopted, including a

plan that he produced and submitted to the Ohio Redistricting Commission for consideration and adoption.

2. Anthony Perlatti

Director, Cuyahoga County Board of Elections
2925 Euclid Avenue
Cleveland, OH 44115

Mr. Perlatti may testify about the impact that Plaintiffs' requested relief would have on the Cuyahoga County Board of Elections and the administration of elections in Cuyahoga County.

3. Richard B. Neal, Jr.

2022 Candidate for Democratic nomination for the office the Ohio House of Representatives
982 Jaeger Street
Columbus, OH 43206

Mr. Neal may testify about the impact that Plaintiffs' requested relief would have on his 2022 candidacy for the Ohio House of Representatives.

In further accordance with the Court's Order, ECF No. 115, the Bennett Petitioners reserve the right to add rebuttal witnesses for the preliminary injunction. Such witnesses, if any, will be disclosed by 5:00 p.m. on March 29, 2022.

Respectfully submitted,

/s/ Donald J. McTigue

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** Admitted pro hac vice

*** Motion for admission pro hac vice
pending

Counsel for Bennett Petitioners

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was served upon all counsel of record by means of the Court's electronic filing system on this 29th Day of March, 2022. Additionally, an in accordance with the Court's Order, ECF No. 115, a copy was sent via email to the following:

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